

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 00-6309-CR-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PAUL DIFILIPPI,

Defendant.

**UNOPPOSED MOTION TO PERMIT TRAVEL**

**COMES NOW** the Defendant, **PAUL DIFILIPPI**, by and through his undersigned counsel, and respectfully moves this Honorable Court to enter an order permitting Mr. DiFilippi to travel outside of the Southern District of Florida for job related purposes between March 14, and March 16, 2001. In furtherance of this motion, Mr. DiFilippi would respectfully set forth the following:

1. Mr. DiFilippi was arrested and charged in the above-styled cause in one count of the Indictment. He is currently on bond, and has abided by all terms and conditions of his release.
2. Mr. DiFilippi is employed by American Classic Voyages. He is an employee services manager, and has been employed with this company since October 18, 2000. In furtherance of his job requirements, it is necessary that he travel on an occasional basis to work sites within the company's corporate chain. The company has requested that Mr. DiFilippi travel to New Orleans, Louisiana between March 14 and March 16, 2001 for work related purposes.

3. It is respectfully requested that this Honorable Court enter an order granting Mr. DiFilippi the opportunity to continue with his employment and allow him to fulfill his duties within that employment.

4. Undersigned counsel certifies that he has contacted Assistant United States Attorney Brian McCormick regarding this request, and the Government has indicated that it does not oppose the granting of this motion. We have also contacted Pretrial Services Officer Carol Siroto, who has advised that she does not oppose this travel request.

**WHEREFORE**, it is respectfully requested that this Honorable Court enter an order granting Mr. DiFilippi the ability to travel for work related purposes as requested in this motion, with the proviso that all other terms and conditions of his release shall remain in effect.

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 1 day of March, 2001 to: **MR. BRIAN McCORMICK**, Assistant U.S. Attorney, Office of the U.S. Attorney, 99 NE 4th Street, Miami, Florida 33132; and **MS. CAROL SIROTO**, U.S. Pre-trial Services, 299 East Broward Blvd., Room 301, Ft. Lauderdale, Florida 33301.

Respectfully submitted,

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By: 

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